REMARKS

In the Official Action mailed 09 June 2003, the Examiner reviewed claims 48-69. The Examiner has indicated that claims 54-56 and 65-67 are allowed. The Examiner has rejected claims 48-53, 57-64 and 68-69 under 35 U.S.C. 102(e).

Applicants have made no amendments (except to claims 48 and 49 to correct minor typographical errors) and have not cancelled any claims in this paper.

Rejection of Claims 48-53, 57-64 and 68-69 under 35 U.S.C. 102(e)
[Sufficiency of Corroborating Evidence]

Claims 48-53, 57-64 and 68-69 are rejected under 35 U.S.C. 102(e) as being disclosed by Baker et al., U.S. Pat. 6,338,067.

Applicants previously submitted declarations of inventors that declared:

> Prior to March 11, 1998, we had implemented a registry for trading partners. The registry was used in a method, also implemented prior to March 11, 1998, in a form sufficient to demonstrate that the method would work for its intended purpose, for establishing transactions among trading partners in a network, comprising: maintaining a registry of machine-readable specifications specifying business services offered by trading partners, the machine-readable specifications including at least one of definitions of, and references to definitions of, services offered and at least one of definitions of, and references to definitions of, documents to be exchanged with such services by trading partners; and providing, in response to a request, one or more of the machine-readable specifications from said registry is via a communication network to a requesting node.

The Examiner rejected these declarations for insufficiency of corroborative evidence, arguing that:

> There is no evidence in Exhibit A of machine-readable specifications including at least one of definitions of, and references to definitions of, services offered and at least one of definitions of, and references to definitions of, documents to be exchanged with such services by trading partners.

> There is no evidence in Exhibit A of data adapted for parsing to identify an input document and one or more transactions which accept said input document.

Applicants find the evidence that the Examiner seeks in Exhibit A, corroborating the clear declarations to which the Examiner made no objection. One needs only to understand the corroborating evidence from the perspective of one of ordinary skill in the art.

There is evidence of machine-readable specifications. First, Exhibit A says, "CBL (Common Business Language) enables semantic interpretation and integration of different commerce applications. CBL defines the metadata for making a business and its services a self-describing 'eCo component'; ... it represents the forms and messages needed for commercial transactions". Metadata, in this context, is machine readable. Citing the 1990 Std 610.5 *IEEE Standard Glossary of Data Management Terminology*, the *IEEE Standard Dictionary of Electrical and Electronics Terms* (6th Ed.) (1996), at page 648, gives as the first definition of metadata, "Data that describes other data; for example, a data dictionary contains a collection of metadata." Second, the evidence is that, "The development of CBL has strongly shaped the requirements for the eCo runtime platform. XML is now at the core of the eCo architecture, and the eCo server can be thought of as an XML processing platform on which CBL is the reference application. The use of XML inside the eCo platform as well as in its applications has enabled the server to be more capable and extensible than we conceived at the time of the proposal." XML is machine-readable data that was used inside the eCo server to represent messages needed for commercial transactions. Each of these excerpts demonstrates that machine-readable specifications were being used in the eCo server, corroborating the declarations.

There is evidence that the machine-readable specifications included definitions of services offered and documents to be exchanged with such services, in the first passage above. The CBL registry makes a business and its services self-describing. Looking again to the *IEEE Standard Glossary of Data Management Terminology*, the *IEEE Standard Dictionary of Electrical and*

Electronics Terms (6th Ed.), at page 961, the definition of "self-descriptiveness" is, "The degree to which a system or component contains enough information to explain its objectives and properties." The metadata represents the forms and messages needed for commercial transactions, which understandably includes input and output messages or documents. In this context, messages and documents are interchangeable. XML was used both to define the messages passed and in the message payloads. More detail, including examples of XML code, are part of the application itself. The declarations are corroborated.

There is evidence that the data is adapted for parsing, as that is the nature of XML. Again, the declarations are corroborated.

When the corroborating evidence is evaluated from the perspective of one of skill in the art, the declarations are fully supported. Accordingly, declarations are corroborated. The declarations are effective to remove Baker (U.S. Pat. No. 6,338,067) and Katz (U.S. Pat. No. 6,055,513) as references.

Rejection of Claims 48-49, 51-52, 58-60, 62-63 and 69 under 35 U.S.C. 102(e) [Baker reference]

Claims 48-49, 51-52, 58-60, 62-63 and 69 are rejected under 35 U.S.C. 102(e) as being disclosed by Baker, U.S. Pat. No. 6,338,067.

Having removed Baker as a reference, the claims should be allowable over Baker.

Rejection of Claims 48-49, 51-52, 58-60, 62-63 and 69 under 35 U.S.C. 102(e) [Katz et al. reference]

Claims 48-49, 51-52, 58-60, 62-63 and 69 are rejected under 35 U:S.C. 102(e) as being disclosed by Katz et al, U.S. Pat. 6,055,513.

Having removed Katz et al. as a reference, the claims should be allowable over Katz et al.

Rejection of Claims 48-53, 57-64 and 68-69 under 35 U.S.C. 102(e) [Mehr et al. reference]

Claims 48-53, 57-64 and 68-69 are rejected under 35 U.S.C. 102(e) as being disclosed by Mehr et al., U.S. Pat. 6,141,658. This is a new argument in this rejection that is not addressed by the previously filed declarations of inventors.

Mehr et al. describes an interface to a data warehouse. Col. 1, line 59 – col. 2, line 3. The data warehouse appears to be a database that can store processes as database objects (col. 2, line 3), though little description is given of stored processes, other than as import (col. 5, lines 1-6) or export (col. 2, lines 11-28, col. 6, lines 15-26) filters for loading the database or reporting from the database.

Addressing the rejected independent claims 48 and 59, we do not see in Mehr et al. "a registry of machine-readable specifications specifying business services offered by trading partners". None of the passages cited by the Examiner address this limitation. The abstract does not mention business services offered by trading partners. FIG. 18 is a data hierarchy diagram for information about car parts. Col. 2, lines 1-10 describe a data warehouse, which is later described as including an object-oriented programming environment (col. 5, lines 29-31). Col. 4, lines 49-63 talks about defining hierarchical relationships between data items. The hierarchical relationship allows expansion of parts of a tree (FIG.7), much as File Explorer in recent versions of the Windows operating system allow expansion of subdirectories. None of these references addresses the limitation quoted above, or the additional limitations, "the machine-readable specifications including at least one of definitions of, and references to definitions of, services offered and at least one of definitions of, and references to definitions of, documents to be exchanged with such services by trading partners". We do not see services offered or documents to be exchanged in any of the cited passages.

The cited "Find" function of FIG. 9 does not "provid[e], in response to a request, one or more of the machine-readable specifications from said registry

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via a communication network to a requesting node". The Find function is used for searching for an instance (col. 8, lines 50-51), much like the File Explorer "Search" function in recent versions of the Windows operating system or in a word processor string search. The antecedent basis for "the machine-readable specifications" is in the first element of claim 48. The result of a FIG. 9 "Find" is not "the machine-readable specification".

In summary, for rejected independent claims 48 and 59, the cited passages do not meet the claimed limitations. The Mehr et al. reference is an improvement on a data warehouse, which is not very much like the claimed invention, at all.

The claims that depend from 48 and 49 are allowable for at least the same reasons as the independent claims.
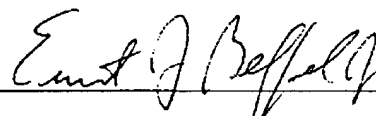
CONCLUSION

Applicants respectfully submit that the claims, as stated herein, are in condition for allowance and solicits acceptance of the claims, in light of these remarks. If the Examiner disagrees and sees amendments that might facilitate allowance of the claims, a call to the undersigned would be appreciated.

Should any questions arise, the undersigned can ordinarily be reached at his office at 650-712-0340 from 8:30 to 5:30 PST, M-F and can be reached at his cell phone 415-902-6112 most other times.

Respectfully submitted,

Dated: 09 December 2003   _____

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